



The Commonwealth of Massachusetts

Office of Campaign & Political Finance

One Ashburton Place, Boston 02108

727-8352

Dennis J. Duffin
Director

March 7, 1986
AO-86-06

Mr. Stephen C. Meyers
Assistant Finance Director
Massachusetts Republican
State Committee
20 East Street
Boston, MA 02111

Dear Mr. Meyers:

This is in response to your recent request for an advisory opinion concerning the application of M.G.L. c. 55, the campaign finance law, to the following.

You state that in connection with your state convention, to be held on April 12, 1986, you will be collecting a delegate fee of twenty-five dollars from each delegate. You argue that the delegate fee is not a contribution. Your questions, and the appropriate answers, are set forth below.

1. Must we individually list each delegate fee as a contribution on form CPF D-106?

The Republican State Committee is a political committee organized for the purpose of influencing the nomination and election of Republican candidates which furthers the interests of the Republican Party. It receives contributions and makes expenditures for that purpose. As a political committee, it is subject to the provisions of the campaign finance law, which includes the reporting of all contributions received and expenditures made. A contribution is money or anything of value given to a political committee. Although the delegate fees may be used for the purpose of defraying costs of the convention, they are nevertheless contributions to the state committee. The purpose for which contributions are used by a political committee does not change the nature of the contribution itself.

2. Is it sufficient disclosure if we list on form CPF D-106 the word delegate fees with a lump sum for that particular deposit?

Mr. Stephen Meyers

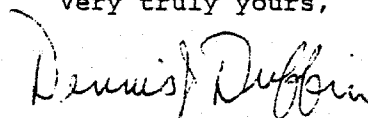
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Having concluded that the delegate fee is a contribution, the campaign finance law provides for the manner in which contributions are to be disclosed by political committees. As a depository political committee, the Republican State Committee must disclose the full name and residential address of each person who makes a contribution of twenty-five dollars or more in a reporting period. Therefore, a lump sum listing of twenty-five dollars or more would not be sufficient disclosure under the campaign finance law.

Please feel free to contact us if you have any further questions.

Very truly yours,

A handwritten signature in dark ink, appearing to read "Dennis J. Duffin". The signature is written in a cursive, flowing style.

Dennis J. Duffin
Director

DJD/rep